



IN THE CIRCUIT COURT OF TENNESSEE FOR THE  
THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

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GEORGE STEPHENSON,

Plaintiff,

vs.

WALMART, INC.

Defendant.

NO. CT-3625-22  
Division IX

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COMPLAINT

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Comes Plaintiff, George Stephenson, and for his Complaint against Defendant, Wal-Mart, Inc., would state to the Court as follows:

1. That Plaintiff, George Stephenson, was and still is a resident of Memphis, Tennessee.
2. That Defendant, Walmart, Inc., to the best of Plaintiff's knowledge and information is and, for all times pertinent to this cause of action, was located and licensed to conduct business in Memphis, Shelby County, Tennessee and has appointed as its registered agent for service of process, C T Corporation System, 300 Montvue Road, Knoxville, Tennessee 37919-5546. This cause of action arose from an incident at Defendant's store located at 7525 Winchester Road, Memphis, Tennessee.
3. That on or about September 4, 2021, Plaintiff was an invitee of Defendant by virtue of the fact that Plaintiff was in Defendant's property to conduct business that would have been of a pecuniary value to the Defendant. Plaintiff was walking near the pharmacy door when he slipped and fell backward on a "slick" shiny floor causing bodily

injuries to him and, therefore; Defendant is directly and proximately responsible for the injuries sustained by Plaintiff.

4. That Defendant, through its employees and/or agents, had a duty to maintain the store premises in a safe and secure manner or to provide warnings by sign or other means.

5. That Defendant's employees and/or agents negligently failed to maintain the premises in a safe manner or to provide warnings.

6. That the negligence of Defendant's employees and/or agents is imputed to said Defendant, Walmart, Inc.

7. That Defendant was negligent in the following manner:

- a. Defendant, through its employees and/or agents, failed to post a warning about the condition of the floor.
- b. Defendant, through its employees and/or agents, failed to take reasonable precautions to avoid personal injury to Plaintiff.
- c. Defendant, through its employees and/or agents, created a hazardous condition on its premises which caused personal injury to Plaintiff.

8. As a proximate result of Defendant's negligence, Plaintiff suffered injuries to his back, neck, hands and right leg.

9. That said injuries necessitated medical care and costs, which Plaintiff incurred as a direct and proximate result of the negligence of Defendant.

10. Plaintiff charges and alleges that all the above acts of negligence on the part of the Defendant were the direct and proximate cause of personal injuries to plaintiff.

11. As a proximate result of Defendant's negligence, Plaintiff endured great pain and suffering and mental anguish and loss of enjoyment of life, all to the Plaintiff's further damage.

12. Based upon the foregoing allegations contained in the preceding paragraphs of this Complaint, Plaintiff is entitled to recover judgment against the Defendant in an amount of \$100,000.00.

**WHEREFORE**, the Plaintiff prays for judgment against Defendant, Walmart, Inc., in a sum of \$100,000.00, for medical expenses, past and future pain and suffering, mental anguish, permanent injury, loss of earnings and earning capacity and loss of enjoyment of life; that this matter be tried by jury; and for such other and further relief that Plaintiff may be entitled.

Respectfully submitted,

GEORGE STEPHENSON, Plaintiff

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